

April 7, 2022

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17120

Dear Secretary Chiavetta,

As a corrosion professional with over 40 years of experience and member of the Association for Materials Protection and Performance (AMPP), I'm writing with respect to Docket L-2019-3010267, which was published in the Pennsylvania Bulletin on February 12, 2022. ***The proposed rulemaking lacks clarity and significantly weakens hazardous liquid public utility safety standards by not fully incorporating modern standards and technologies.***

As a pipeline safety professional, I believe the proposed rule will harm overall pipeline safety efforts in the Commonwealth of Pennsylvania. The proposed rule runs contrary to best practices in the field of corrosion control, specifically in relation to the application of cathodic protection technology. NACE Standard SP0169 changed the pipeline industry when it was first published in 1969 and the Department of Transportation's Pipeline and Hazardous Materials Safety Administration's (PHMSA) data shows the dramatic drop in corrosion-related pipeline failures after this standard was adopted in industry. SP0169 is the only industry consensus safety standard addressing cathodic protection and AMPP has diligently maintained the state-of-the-art nature of the standard in regularly published updates.

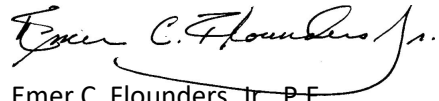
The PUC's proposed changes in relation to Docket L-2019-3010267 do not fully incorporate the most recent version of NACE SP0169, but rather selects parts of the safety standard to leave out. Using this standard piecemeal is a perplexing approach not seen in other states, and it will lead to technical confusion, mismanagement, and misapplication. The Pennsylvania Utility Commission (PUC) must revisit this decision and fully incorporate this standard to ensure the highest levels of pipeline safety—please consider the experienced views of corrosion experts. We believe the safety of the public and the environment is at risk with the proposed changes.

AMPP is a newly merged organization combining the Society of Protective Coatings and NACE International. The association represents more than 36,000 members who work to help governments and industries prevent corrosion and materials-related failures. AMPP develops standards and training to ensure assets are protected from the devastating effects of corrosion. When corrosion planning is not at the forefront of public policy, assets are not protected and the risk of catastrophic failures to the environment and society increases exponentially.

AMPP and AMPP members promote policies that enhance asset integrity and sustainability, environmental protection, and public safety. AMPP partners with governments and organizations dedicated to increasing pipeline safety, including PHMSA and the PUC. As pipeline professionals, we're dedicated to increasing the quality of training and education, and we look forward to working with the PUC increase pipeline safety efforts in the proposed rulemaking.

Thank you for your time and consideration. I appreciate all you do on behalf of myself and all Pennsylvania residents. Should you have any questions or need more information, please don't hesitate to reach out to AMPP's Manager of Government Relations, Adam Christopher (adam.christopher@ampp.org) or me.

Sincerely,



Emer C. Flounders, Jr., P.E.
Business Development Manager, PureHM
1800 Saint Georges Road
Dresher, Pennsylvania 19025
T 215.658.0238 | M 215.356.9090



AMPP, Association for Materials Protection and Performance

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